

**NO. 15-1235**

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**UNITED STATES COURT OF APPEALS  
FOR THE FEDERAL CIRCUIT**

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**HIGH POINT SARL,**

*Plaintiff-Appellant,*

*v.*

**T-MOBILE USA, INC., ERICSSON INC., AND NOKIA  
SOLUTIONS AND NETWORKS US LLC,**

*Defendants-Appellees.*

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Appeal from the United States District Court  
for the District of New Jersey  
The Honorable Judge Joseph E. Irenas, Presiding  
Case No. 1:23-cv-01453-JEI-AMD

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**APPELLEES' UNOPPOSED MOTION FOR 47-DAY  
EXTENSION OF TIME FOR FILING THEIR BRIEF**

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Defendants-Appellees T-Mobile USA, Inc., Ericsson, Inc., and Nokia Solutions and Networks US LLC respectfully request that the Court extend the deadline for filing their Response Brief by 47 days. This is Appellees' first request for an extension of time in this case. The Response Brief is currently due to be filed on May 7, 2015, and the extension sought here would extend the due date up to and including June 23, 2015.

Good cause exists for the Court to grant this extension of time. First, the requested extension is necessary in view of the press of other business, as counsel for T-Mobile have various business commitments in April, May and June, as forth in the attached declaration of Asim Bhansali. Second, the additional time is necessary because the appellees' briefing implicates issues involving multiple parties, and additional time will facilitate a better organized, coordinated, and more efficient presentation of those issues to the Court.

Plaintiff-Appellant High Point SARL has stated that it does not oppose Appellees' requested extension.

Dated: April 15, 2015

Respectfully submitted,

/s/ Asim M. Bhansali

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***Counsel for Defendant-Appellee  
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Dated: April 15, 2015

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Dated: April 15, 2015

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NETWORKS US LLC***

**CERTIFICATE OF INTEREST**

Counsel for Appellee T-Mobile USA, Inc. certifies the following:

1. The full name of every party or amicus represented by me is:

T-Mobile USA, Inc.

2. The name of the real party in interest (if the party named in the caption is not the real party in interest) represented by me is:

N/A

3. All parent corporations and any publicly held companies that own 10 percent or more of the stock of the party or amicus represented by me are:

T-Mobile USA, Inc., a Delaware corporation, is a wholly-owned subsidiary of T-Mobile US, Inc., a Delaware corporation. T-Mobile US, Inc. (NYSE: TMUS) is a publicly-traded company listed on the New York Stock Exchange (“NYSE”). Deutsche Telekom Holding B.V., a limited liability company (*besloten vennootschap met beperkte aansprakelijkheid*) organized and existing under the laws of the Netherlands (“DT B.V.”), owns more than 10% of the shares of T-Mobile US, Inc. DT B.V. is a direct wholly-owned subsidiary of T-Mobile Global Holding GmbH, a Gesellschaft mit beschränkter Haftung organized and existing under the laws of the Federal Republic of Germany (“Holding”). Holding, is in turn a direct wholly-owned subsidiary of T-Mobile Global Zwischenholding GmbH, a Gesellschaft mit beschränkter Haftung organized and existing under the laws of the Federal Republic of Germany (“Global”). Global is a direct wholly-owned subsidiary of Deutsche Telekom AG, an Aktiengesellschaft organized and existing under the laws of the Federal Republic of Germany (“Deutsche Telekom”). The principal trading market for Deutsche Telekom’s ordinary shares is the Frankfurt Stock Exchange. Deutsche Telekom’s ordinary shares also trade on the Berlin, Düsseldorf, Hamburg, Hannover, München and Stuttgart stock exchanges in Germany. Deutsche Telekom’s American Depositary Shares (“ADSs”), each representing one

ordinary share, trade on the OTC market's highest tier, OTCQX International Premier (ticker symbol: "DTEGY").

4. The names of all law firms and the partners or associates that appeared for the party or amicus now represented by me in the trial court or agency or are expected to appear in this court are:

**KEKER & VAN NEST LLP**

Asim M. Bhansali  
R. Adam Lauridsen  
Justina Sessions

Leo L. Lam  
Benjamin Rothstein  
Theresa H. Nguyen

Paula L. Blizzard  
(formerly of Keker & Van  
Nest LLP)

**PERKINS COIE LLP**

Dan L. Bagatell  
Jared W. Crop

Ryan J. McBrayer  
Carmen G. Wong

Christina J. McCullough

**SCHNADER HARRISON SEGAL & LEWIS LLP**

Lisa J. Rodriguez

**DENTONS US LLP**

Marc S. Friedman  
Andrew M. Grodin

Dated: April 15, 2015

/s/ Asim M. Bhansali  
Asim M. Bhansali

**CERTIFICATE OF INTEREST**

Counsel for Appellee Ericsson, Inc. certifies the following:

1. The full name of every party or amicus represented by me is:

Ericsson, Inc.

2. The name of the real party in interest (if the party named in the caption is not the real party in interest) represented by me is:

N/A

3. All parent corporations and any publicly held companies that own 10 percent or more of the stock of the party or amicus represented by me are:

Ericsson Inc. is wholly owned by Ericsson Holding II Inc., which in turn is wholly owned by Telefonaktiebolaget LM Ericsson.

Telefonaktiebolaget LM Ericsson is publicly held and trades in the United States through American Depositary Receipts under the name LM Ericsson Telephone Company.

4. The names of all law firms and the partners or associates that appeared for the party or amicus now represented by me in the trial court or agency or are expected to appear in this court are:

**LERNER DAVID LITTENBERG KRUMHOLZ & MENTLIK LLP**

William L. Mentlik  
Jeffrey S. Dickey

Roy H. Wepner  
Andrew T. Zidel  
Natalie S. Richer

Jonathan A. David  
Robert B. Hander

Dated: April 15, 2015

/s/ William L. Mentlik

William L. Mentlik

**CERTIFICATE OF INTEREST**

Counsel for Appellee Nokia Solutions and Networks US LLC certifies the following:

1. The full name of every party or amicus represented by me is:  
Nokia Solutions and Networks US LLC
2. The name of the real party in interest (if the party named in the caption is not the real party in interest) represented by me is:  
N/A
3. All parent corporations and any publicly held companies that own 10 percent or more of the stock of the party or amicus represented by me are:  
  
Nokia Solutions and Networks US LLC is a wholly-owned subsidiary of Nokia Solutions and Networks Holdings USA Inc., which is a wholly-owned subsidiary of Nokia Solutions and Networks B.V., which is a wholly-owned subsidiary of Nokia Finance International B.V., which is a wholly-owned subsidiary of Nokia Corporation; and there is no publicly held company that owns 10% or more of Nokia Solutions and Networks US LLC's stock.
4. The names of all law firms and the partners or associates that appeared for the party or amicus now represented by me in the trial court or agency or are expected to appear in this court are:

**KING & SPALDING LLP**

Daryl L. Joseffer  
Christopher C. Carnaval

Robert F. Perry  
Adam M. Conrad  
Chandan Sarkar

Allison H. Altersohn  
Anup M. Shah

**CONNELL FOLEY LLP**

Liza M. Walsh  
Katelyn O'Reilly

Dated: April 15, 2015

/s/ Daryl L. Joseffer  
Daryl L. Joseffer



**DECLARATION OF ASIM M. BHANSALI**

1. I am lead counsel for Appellee T-Mobile USA, Inc. (T-Mobile) in this appeal.

2. Since the filing of Appellant High Point SARL's ("High Point") Opening Brief on March 23, 2015 and through the months of April, May and June 2015, I have had and will have various commitments in other cases, and those commitments require me to request an extension of the current due date for Appellees' Response Brief in this case. In particular, I had a reply brief due on a complex motion in one matter on April 13 and have a motion to dismiss due in another matter on April 16, and a hearing on a motion to dismiss on June 12.

3. I am informed by co-counsel for T-Mobile, Dan Bagatell, that he has multiple major briefs due in the Federal Circuit and other forums during April and May, and that he had previously scheduled two weeks of vacation in late May and early June.

4. Appellees T-Mobile, Ericsson, Inc., and Nokia Solutions and Networks US LLC intend to coordinate their efforts to minimize the volume of, and avoid duplication in, their briefing to this Court.

5. I contacted Martin J. Black, counsel for Appellant High Point regarding this extension. Mr. Black informed me that High Point does not oppose the requested extension to and including June 23, 2015.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Dated: April 15, 2015

/s/ Asim M. Bhansali

Asim M. Bhansali

**CERTIFICATE OF SERVICE**

In accordance with Federal Rule of Appellate Procedure 25 and Federal Circuit Rule 25, I certify that I served a copy of the foregoing document on counsel of record on April 15, 2015 by Electronic Means (CM/ECF).

I certify that I have the authority of my co-counsel William L. Mentlik and Daryl L. Joseffer to file this motion with their electronic signatures.

Dated: April 15, 2015

/s/ Asim M. Bhansali

Asim M. Bhansali